

NOTICE OF VIOLATION

December 14, 2020

Mr. Edward Human
Director MHIC
Sunoco Partners Marketing & Terminals, L.P.
100 Green Street
Marcus Hook, PA 19061

Re: Title V Operating Permit 23-00119
Operating Permit Violations
Marcus Hook Borough
Delaware County

Dear Mr. Human:

On November 18 and December 1, 2020, I inspected Sunoco Partners Marketing and Terminals, L.P.'s (SPMT) Leak Detection and Repair Program and noted the following violations:

- 1) Title V Operating Permit (TVOP) 23-00119, Section D, Source ID: 103: NSPS Subpart VVa Fugitive Equipment Leaks, Condition #016(a)(1) requires pumps to be monitored monthly via EPA Method 21. No pump monitoring was conducted on four pumps in light liquid service – Tag Nos. 39074, 33640, 33676 and 28057 – in the ME 2 LDAR Unit in November 2019.
- 2) TVOP 23-00119, Section D, Source ID: 103: NSPS Subpart VVa Fugitive Equipment Leaks, Condition #016(a)(1) and (2) requires pumps to be monitored monthly via EPA Method 21 and to be inspected visually each calendar week. No pump monitoring was conducted on four pumps in the C5 Splitter LDAR Unit (Depentanizer) from July 1, 2016 until Third Quarter 2017 when monitoring was initiated following their status designation change to “in-service” in LeakDAS on August 10, 2017.
- 3) TVOP 23-00119, Section D, Source ID: 103: NSPS Subpart VVa Fugitive Equipment Leaks, Condition #021(a) and (b) requires valves in gas vapor/light liquid service to be monitored monthly, or quarterly depending on the EPA Method 21 measured leak rate and monitoring events above the leak rate. No valve monitoring was conducted at valve Tag No. 28342 within the ME 2 LDAR Unit during Second Quarter 2019. No valve monitoring was conducted on 460 valves in the C5 Splitter LDAR Unit (Depentanizer) from July 1, 2016 until Third Quarter 2017 when monitoring was initiated

following their status designation change to "in-service" in LeakDAS on August 10, 2017.

Paragraphs 1-3 are contrary to TVOP 23-00119 and are violations of 25 Pa. Code Section 127.444.

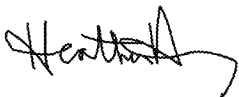
I request that you submit to me a detailed corrective action plan no later than 15 days from the date of this letter explaining why the above violation(s) occurred, how missed monitoring will be prevented from occurring, and how you will prevent similar violations from occurring in the future.

The above violations constitute unlawful conduct and a public nuisance as defined by Sections 8 and 13 of the Air Pollution Control Act (APCA), 35 P.S. Sections 4008 and 4013, respectively. Violations of the Department of Environmental Protection's (DEP) Air Quality Regulations are subject to the penalties of Sections 9 and 9.1 of the APCA. Each day the violation continues constitutes a separate offense.

This Notice of Violation is neither an order nor any other final action of DEP. It neither imposes nor waives any enforcement action available to DEP under any of its statutes. If DEP determines that an enforcement action is appropriate, you will be notified of the action.

If you have any questions concerning this matter, please contact me at hehenry@pa.gov or at 484.877.6092.

Sincerely,



Heather Henry
Air Quality Specialist
Air Quality

cc: Mr. McLemore (via email)
Ms. Gallagher (via email)
Mr. Rebarchak (via email)
Central Office (via email)
Delaware County Planning Department (via email)
Anne Stauffer (StaufferA@co.delaware.pa.us)
Enforcement File

Pennsylvania Department of Environmental Protection
Bureau of Air Quality
High Priority Violator Report

Primary Facility Id:	757998	SPMT / MARCUS HOOK IND COMPLEX			
Tax Id/Plant:	23-3102655-3	CDS Num:	4204500331	AFS Num:	420450331
County:	Delaware	Municipality:	Marcus Hook		

EPA Code - M	Toxics - N	Hazard - N	MACT - N
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Enforcement ID:	390722	NOV Date:	14 DEC 2020	Enforcement Airs Action Nbr:	595
NOV Addressed Date:	OPEN	Status:			

Inspection Id:	3115091	Inspection Airs Action Nbr:	594
Inspection Date:	01 DEC 2020	Compliance Inspector:	HEATHER HENRY
<p>Violation: Construction, Modification, Reactivation and Operation of Sources, Operating Permit Requirements, Compliance requirements. A person may not cause or permit the operation of a source subject to this article unless the source and air cleaning devices identified in the application for the plan approval and operating permit and the plan approval issued to the source are operated and maintained in accordance with specifications in the application and conditions in the plan approval and operating permit issued by the Department. A person may not cause or permit the operation of an air contamination source subject to this chapter in a manner inconsistent with good operating practices.</p>			
<p>Pollutants: 12 - VOC</p>			

Questions Answered :YES

NSPS violation. (Criterion 3)